

**UNITED STATES BANKRUPTCY COURT
DISTRICT OF NEW JERSEY**

WOLLMUTH MAHER & DEUTSCH LLP

Paul R. DeFilippo, Esq.
500 Fifth Avenue
New York, New York 10110
Telephone: (212) 382-3300
Facsimile: (212) 382-0050
pdefilippo@wmd-law.com

JONES DAY

Gregory M. Gordon, Esq.
Brad B. Erens, Esq.
Dan B. Prieto, Esq.
Amanda Rush, Esq.
2727 N. Harwood Street
Dallas, Texas 75201
Telephone: (214) 220-3939
Facsimile: (214) 969-5100
gmgordon@jonesday.com
bberens@jonesday.com
dbprieto@jonesday.com
asrush@jonesday.com
(Admissions *pro hac vice* pending)

PROPOSED ATTORNEYS FOR DEBTOR

In re:

LTL MANAGEMENT LLC,¹
Debtor.

LTL MANAGEMENT LLC,
Plaintiff,
v.

THOSE PARTIES LISTED ON APPENDIX A TO
COMPLAINT and JOHN AND JANE DOES 1-1000,
Defendants.

Chapter 11

Case No.: 23-12825 (MBK)

Judge: Michael B. Kaplan

Adv. No. 23-01092 (MBK)

**NOTICE OF DEBTOR'S MOTION FOR ENTRY OF AN ORDER AUTHORIZING
THE FILING UNDER SEAL OF CERTAIN CONFIDENTIAL EXHIBITS RELATED
TO DEBTOR'S COMPLAINT FOR INJUNCTIVE RELIEF AND RELATED MOTION**

¹ The last four digits of the Debtor's taxpayer identification number are 6622. The Debtor's address is 501 George Street, New Brunswick, New Jersey 08933.

PLEASE TAKE NOTICE that, on the date set by the Court pursuant to a proposed Order Shortening Time (“OST”) and Application therefor to be submitted, LTL Management LLC, the above-captioned debtor (the “Debtor”), by and through its counsel, shall move before the Honorable Michael B. Kaplan, United States Bankruptcy Court, at the United States Bankruptcy Court, Clarkson S. Fisher U.S. Courthouse, 402 East State Street, Trenton, New Jersey 08608, for the entry of an order pursuant to D.N.J. LBR 9018-1 to seal the filing of the confidential documents identified below (the “Confidential Documents”). The Confidential Documents are among those exhibits previously provided to the Court under seal² and admitted into evidence in connection with the November 4-5, 2021, and February 14-18, 2022, hearings requesting the same relief as that requested in this adversary proceeding in the Debtor’s prior chapter 11 case. See In re LTL Mgmt. LLC, No. 21-30589 (MBK) [Dkt. 1497] (Bankr. D.N.J. 2002).

The Confidential Documents are:

- Documents reflecting Debtor and non-Debtor affiliates’ insurance coverage; and
- Commercially sensitive agreements between Johnson & Johnson Consumer, Inc. or Johnson & Johnson Consumer Companies, Inc., and (i) Pharma Tech Industries, Inc.; (ii) Bausch Health Companies (f/k/a Valeant Pharmaceuticals); and (iii) Valeant Pharmaceuticals International, Inc.

PLEASE TAKE FURTHER NOTICE that in support of Debtor’s Motion to Seal (the “Motion”), the Debtor shall rely on the Declaration of John K. Kim, which includes an Index, and the memorandum of law submitted herewith pursuant to D.N.J. LBR 9013-1(a).

² LTL Mgmt. LLC v. Those Parties Listed on Appendix A to Complaint (In re LTL Mgmt. LLC), No. 21-3032 (MBK) [Dkt. 175] (Bankr. D.N.J. 2022) (granting Debtor’s motion to seal the same Confidential Documents).

PLEASE TAKE FURTHER NOTICE that, pursuant to D.N.J. LBR 9013-2, responsive papers, if any, must be filed with the Clerk of the Bankruptcy Court, Clarkson S. Fisher Courthouse, 402 East State Street, Trenton, New Jersey 08608, and served upon the Debtor's undersigned counsel in accordance with any OST entered by the Court.

PLEASE TAKE FURTHER NOTICE that, unless an objection is timely filed and served, the Motion will be deemed uncontested in accordance with D.N.J. LBR 9013-3(d) and the relief may be granted without a hearing.

Dated: April 5, 2023

WOLLMUTH MAHER & DEUTSCH LLP

/s/ Paul R. DeFilippo
Paul R. DeFilippo, Esq.
James N. Lawlor, Esq.
Joseph F. Pacelli, Esq. (*pro hac vice* pending)
500 Fifth Avenue
New York, New York 10110
Telephone: (212) 382-3300
Facsimile: (212) 382-0050
pdefilippo@wmd-law.com
jlawlor@wmd-law.com
jpacelli@wmd-law.com

JONES DAY
Gregory M. Gordon, Esq.
Brad B. Erens, Esq.
Dan B. Prieto, Esq.
Amanda Rush, Esq.
2727 N. Harwood Street
Dallas, Texas 75201
Telephone: (214) 220-3939
Facsimile: (214) 969-5100
gmkgordon@jonesday.com
bberens@jonesday.com
dbprieto@jonesday.com
asrush@jonesday.com
(Admissions *pro hac vice* pending)

PROPOSED ATTORNEYS FOR DEBTOR